

**CARELLA, BYRNE, CECCHI, OLSTEIN, BRODY & AGNELLO, P.C.****COUNSELLORS AT LAW**

JAN ALAN BRODY  
JOHN M. AGNELLO  
CHARLES M. CARELLA  
JAMES E. CECCHI

CHARLES C. CARELLA  
1933 – 2023

DONALD F. MICELI  
CARL R. WOODWARD, III  
MELISSA E. FLAX  
DAVID G. GILFILLAN  
G. GLENNON TROUBLEFIELD  
BRIAN H. FENLON  
CAROLINE F. BARTLETT  
ZACHARY S. BOWER+  
DONALD A. ECKLUND  
CHRISTOPHER H. WESTRICK\*  
STEPHEN R. DANER  
MICHAEL A. INNES  
MEGAN A. NATALE  
KEVIN G. COOPER

**5 BECKER FARM ROAD  
ROSELAND, N.J. 07068-1739  
PHONE (973) 994-1700  
FAX (973) 994-1744  
www.carellabyrne.com**

PETER G. STEWART  
FRANCIS C. HAND  
JAMES A. O'BRIEN, III  
JOHN G. ESMERADO  
STEVEN G. TYSON  
MATTHEW J. CERES  
ZACHARY A. JACOBS\*\*\*  
JASON H. ALPERSTEIN+ +

RAYMOND J. LILLIE  
GREGORY G. MAROTTA  
MARYSSA P. GEIST  
JORDAN M. STEELE\*\*  
SEAN M. KILEY  
ROBERT J. VASQUEZ  
BRITTNEY M. MASTRANGELO  
GRANT Y. LEE\*\*\*

OF COUNSEL

\*CERTIFIED BY THE SUPREME COURT OF  
NEW JERSEY AS A CIVIL TRIAL ATTORNEY

\*\*MEMBER NY BAR

\*\*\*MEMBER IL BAR

+MEMBER FL BAR

+ + MEMBER NY &amp; FL BAR

July 24, 2024

**VIA ECF**

Hon. Brian R. Martinotti, U.S.D.J.  
United States District Court, District of New Jersey  
Frank Lautenberg Post Office & U.S. Courthouse  
2 Federal Plaza, 3rd Floor  
Newark, New Jersey 07102

**Re: *In Re: Insulin Pricing Litigation*, Case No. 2:23-md-3080-(BRM/RLS)**

Dear Judge Martinotti:

We write on behalf of all class plaintiffs (TPP PBM, Direct Purchaser, TPP Manufacturer) and all Defendants (Manufacturer and PBM). The parties have met and conferred and jointly propose the below schedule for a consolidated amended class action complaint and briefing on motions to dismiss, with the further agreement to treat Thanksgiving week (November 25-29) and Christmas week (December 23-27) as holidays.

<b>Event</b>	<b>Deadline (business day on or after):</b>
Consolidated Amended Class Action Complaint	30 days following Order approving consolidation <sup>1</sup>
Motions to Dismiss. The Manufacturer and PBM Defendants shall each file one consolidated motion.	45 days after amended complaint
Opposition(s) to Motions to Dismiss	45 days after Motions to Dismiss
Replies to Motions to Dismiss	28 days after opposition(s)

<sup>1</sup> Plaintiffs filed a pre-motion letter seeking consolidation on June 5, 2024. ECF No. 195. Pursuant to CMO #5, ¶ IV.6 (ECF No. 127), the parties agree that the August 1, 2024 deadline to amend or add new parties in CMO #10, ECF No. 198, is held in abeyance pending the Court's decision on consolidation.

July 24, 2024

Page 2

We thank the Court for its continued attention to this matter.

Respectfully submitted,

CARELLA, BYRNE, CECCHI,  
OLSTEIN, BRODY & AGNELLO

/s/ Donald A. Ecklund

DONALD A. ECKLUND

cc: All Counsel (via ECF)

SO ORDERED:

*/s/ Brian R. Martinotti*  
BRIAN R. MARTINOTTI, USDJ  
DATED: JULY 25, 2024